

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW HAMPSHIRE**

In Re: Brian Goodman, Sr.

Debtor

Case No.: 25-10233-KB
Chapter 13

US Bank Trust, NA
Movant

v.

Brian Goodman, Sr.
Respondent

Hearing Date: 8/22/2025
Hearing Time: 10:00 A.M.

DEBTOR'S ANSWER AND OBJECTION
TO
MOVANT'S MOTION FOR RELIEF FROM AUTOMATIC STAY

NOW COMES the Debtor and Respondent in the above-captioned matter, Brian Goodman, Sr., by and through his Attorneys, Raymond J. DiLucci, P.A. and Answers and Objects to Movant's Motion for Relief from Automatic Stay and in support thereof says:

1. That the Respondent admits the allegations contained in paragraph 1.
2. That the Respondent admits the allegations contained in paragraph 2.
3. That the Respondent admits the allegations contained in paragraph 3.
4. That the Respondent admits the allegations contained in paragraph 4.
5. That the Respondent admits the allegations contained in paragraph 5.
6. That the Respondent admits the allegations contained in paragraph 6.
7. That the Respondent denies the allegations contained in paragraph 7 and states that he believes payments were made.
8. That the Respondent admits the allegations contained in paragraph 8 regarding the fair market value, however lacks sufficient knowledge to admit or deny the allegations regarding the liquidation value.

9. That the Respondent denies the allegations contained in paragraph 9 and restates that he believes payments were made.
10. That the Respondent denies the allegations contained in paragraph 10 and again restates that he believes payments were made.
11. That the Respondent admits the allegations contained in paragraph 11 match the Proof of Claim.
12. That the Respondent admits the allegations contained in paragraph 12 however states that the Attachment of Concord Hospital is to be Avoided as an impairment to the homestead exemption.
13. That the Respondent denies the allegations contained in paragraph 13.
14. That the Respondent denies the allegations contained in paragraph 14.

WHEREFORE, the Respondent respectfully request that this Honorable Court:

- A. Deny Movant's Motion for Relief from Automatic Stay; and
- B. For such other and further relief as is deemed fair, just and equitable.

Respectfully submitted,
Brian Goodman, Sr.
By and through his Attorney,

Dated: October 16, 2025

/s/ Kathleen E. McKenzie, Esq.
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